

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**RESPONSE OF POSTAL SERVICE WITNESS MARTIN TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY,
REDIRECTED FROM WITNESS WILLIAMS (APWU/USPS-T1-34)**

The United States Postal Service hereby provides the response of
Witness Martin (USPS-T-6) to the above-referenced interrogatory of the
American Postal Workers Union (APWU), AFL-CIO, dated February 23, 2012.
The interrogatory is redirected from Witness Williams (USPS-T-1). The
interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY,
REDIRECTED FROM WITNESS WILLIAMS**

APWU/USPS-T1-34. Page 26 of your testimony states that “[t]he Postal Service will continue to provide a 1-3 day Priority Mail service after network consolidation is implemented,” and that it will also “continue to provide overnight Express Mail service.” Your testimony further states that for both Priority Mail and Express Mail, “[t]he standards from each origin zone to the remainder of the country will be defined by the capability of the realigned mail processing network.”

- a) What will be the impact of the realigned network on the service standards of these competitive products?
 - i. What percentage of Express Mail volume is currently delivered in one day? How will this change under the realigned network?
 - ii. What percentage of Priority Mail volume is currently delivered in one day? In two days? In 3 days? In more than three days? What will these figures be under the realigned network?
- b) What is the anticipated impact on the parcel components of these competitive products?
 - i. What percentage of Express Mail parcel volume is currently delivered in one day? How will this change under the realigned network?
 - ii. What percentage of Priority Mail parcel volume is currently delivered in one day? In two days? In 3 days? In more than three days? What will these figures be under the realigned network?
- c) What percentage of Priority Mail and Express Mail respectively, will experience a downgrade in actual service time due to the network realignment?
- d) Will Priority Mail and Express Mail require product specific transportation after network realignment?

RESPONSE:

(a-c) [Responses provided by Witness Williams (USPS-T-1).]

- (d) Product-specific transportation for Priority Mail and Express Mail is anticipated to be similar to the transportation in today's environment. For example, Express Mail is currently transported on the night turn FedEx network and will continue to be transported in that manner in the rationalized network. In some instances it may be necessary to provide product-specific transportation based on the service standards, as is done today.